

Before the
Federal Communications Commission
Washington DC 20554

In the Matter of	:	
	:	
Carrier Current Systems, Including	:	ET Docket No. 03-104
Broadband over Power Line Systems	:	
	:	
Amendment of Part 15 Regarding New	:	
Requirements and Measurement Guidelines	:	ET Docket No. 04-37
for Access Broadband over Power Line	:	
Systems	:	
To: The Secretary		

**RESPONSE TO PETITION FOR RECONSIDERATION OF
CURRENT TECHNOLOGIES, LLC**

Pursuant to Section 1.429 of the Commission's Rules, ACcess Broadband, LLC ("ACcess Broadband"), a company that markets broadband over power line (BPL) equipment and services to municipal and cooperative utilities, and that has distribution rights for equipment and technology which is owned and manufactured by CURRENT Technologies, LLC and BPL services provided by CURRENT Communications Services, LLC, files this Response to the Petition for Reconsideration of the Commission's Report and Order in the above-captioned proceeding¹. In doing so, ACcess Broadband wishes to indicate its support of the Petition for Reconsideration of CURRENT Technologies, LLC ("CURRENT") filed in the above-captioned proceeding on February 7, 2005 (the "CURRENT Petition").

¹ *New Requirements and Measurement Guidelines for Access Broadband over Power Line Systems*, 19 FCC Rcd 21265 (2004) (Report and Order).

For the reasons cited in the CURRENT Petition, ACcess Broadband shares the opinion that the new regulatory framework will facilitate BPL's bringing reliable, economical broadband access to places that are not presently served, and will add new competition where service is currently unavailable. (CURRENT Petition pp. 1-3)

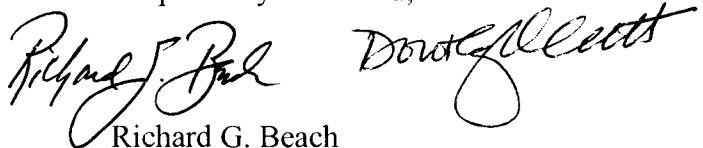
ACcess Broadband also shares CURRENT's concerns expressed in the CURRENT Petition regarding the requirement that disclosures of new BPL installations be placed in the public database 30 days before service begins will impair BPL's competitive position. Such a requirement would only permit incumbent providers a full month to target market in the BPL deployment areas with cut-rate offers for immediate service, while offering no advantages to the public. BPL providers trying to enter the market would be materially disadvantaged by this requirement. (CURRENT PETITION pp. 4-7).

ACcess Broadband further shares CURRENT's concerns expressed in the CURRENT Petition regarding the requirement that BPL equipment manufactured, imported, marketed or installed on or after July 7, 2006, be certified. (CURRENT Petition, pp.8-10). In order to receive shipment and install only certified devices after July 7, 2006, would mean that CURRENT (and other BPL equipment providers) would have to empty the distribution pipeline of old product by that date and refill it with newly manufactured, certified product. ACcess anticipates that during this period, it will be involved in several fast growing deployments. Id. This timetable would leave only approximately nine months to redesign, test, and complete the certification process for all components of a BPL system. This timetable may not be feasible.

Id. Therefore, ACcess urges the Commission to grandfather equipment that is manufactured or held in inventory in this country, on or before July 7, 2006, from the certification requirement.

Further, ACcess shares CURRENT's suggestion that BPL providers receive an additional 18 months, until January 7, 2008, before they must market and install only certified devices. (Current Petition p. 10).

Respectfully submitted,

The block contains two handwritten signatures in black ink. The signature on the left is for Richard G. Beach, and the signature on the right is for Dorothy K. Corbett. Both signatures are written in a cursive, flowing style.

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CERTIFICATE OF SERVICE

I, Richard G. Beach, and I, Dorothy K. Corbett, hereby certify that I have served on this 22nd day of March, 2005, a copy of the foregoing **Response to Petition for Reconsideration** upon the following parties by first-class mail, postage pre-paid:

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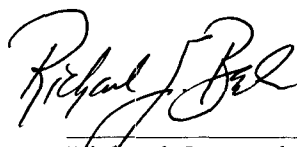
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